

BEFORE THE ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI

**FILED**

DEC 19 2006

ADMINISTRATIVE HEARING  
COMMISSION

W. DALE FINKE, Director  
Missouri Department of Insurance,  
Financial Institutions and  
Professional Registration

Petitioner,

v.

ANDREA L. JOHNSON

Respondent.

Serve at:

1229B 11<sup>th</sup> Street Dr., RAFB  
Warner Robbins, GA 31098  
(478) 213-4933

CASE NO. 061101317C

**COMPLAINT**

W. Dale Finke, Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration ("Department of Insurance"), through counsel, complains and requests the Administrative Hearing Commission find that cause exists for disciplinary action against Respondent Andrea L. Johnson ("Respondent Johnson") because:

1. Petitioner is the Director of the Department of Insurance whose duties, pursuant to RSMo Chapters 374 and 375, include the supervision and regulation of insurance producer licenses.
2. At all times mentioned herein, Respondent Johnson was a licensed insurance producer (license #PR328436) in the state of Missouri. Respondent Johnson's insurance producer license is currently active and in good standing.
3. This Commission has jurisdiction over this Complaint pursuant to § 621.045, RSMo (2000).

**COUNT I**

4. Petitioner realleges and expressly incorporates the allegations in paragraphs 1-3.

5. Respondent Johnson has knowingly violated an insurance law, regulation, subpoena or order of the director or of another insurance commissioner in any other state, a ground for discipline under § 375.141.1(2), RSMo (Cumulative Supp. 2005).

6. The facts are as follows:

a. On or about July 25, 2006, Respondent Johnson was sent a letter by an investigator of the Department of Insurance, pursuant to an open investigation of Respondent Johnson, and instructed to respond by August 22, 2006 to various inquiries and concerns expressed in the letter;

b. Respondent Johnson failed to respond to the aforementioned letter; and

c. Respondent Johnson thereby violated § 374.210, RSMo (2000).

7. As a result of the foregoing, sufficient grounds exist for disciplining Respondent Johnson's insurance license pursuant to § 375.141.1(2), RSMo (Cumulative Supp. 2005).

## **COUNT II**

8. Petitioner realleges and expressly incorporates by reference the allegations in paragraphs 1-3.

9. Respondent Johnson has had an insurance producer license, or its equivalent, denied, suspended or revoked in another state, province, district or territory, a ground for discipline under § 375.141.1(9), RSMo (Cumulative Supp. 2005).

10. The facts are as follows:

a. On or about August 18, 2006, Respondent Johnson had suspended an insurance producer license, or its equivalent, by the State of Indiana.

11. As a result, sufficient grounds exist for disciplining Respondent Johnson's insurance license pursuant to § 375.141.1(9), RSMo (Cumulative Supp. 2005).

### COUNT III

12. Petitioner realleges and expressly incorporates by reference the allegations in paragraphs 1-3.

13. Respondent Johnson has knowingly violated an insurance law, regulation, subpoena or order of the director or of another insurance commissioner in any other state, a ground for discipline under § 375.141.1(2), RSMo (Cumulative Supp. 2005).

14. The facts are as follows:

a. On or about August 18, 2006 Respondent Johnson had suspended an insurance producer license, or it equivalent, by the State of Indiana;

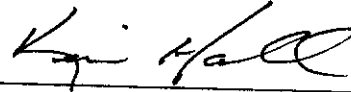
b. As of December 15, 2006, Respondent Johnson has never reported or otherwise provided a copy of an order or other relevant legal document regarding the aforementioned administrative action to the director of the Department of Insurance; and

c. Respondent Johnson thereby violated § 375.141.6, RSMo (Cumulative Supp. 2005).

15. As a result of the foregoing, sufficient grounds exist for disciplining Respondent Johnson's insurance license pursuant to § 375.141.1(2), RSMo (Cumulative Supp. 2005).

**WHEREFORE**, based on the foregoing, Petitioner respectfully requests that the Commission make findings of facts and conclusions of law stating that Petitioner has established cause to discipline the insurance producer license of Respondent Andrea L. Johnson.

Respectfully submitted,



KEVIN HALL

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ATTORNEY FOR PETITIONER  
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